

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MALEEHA AHMAD, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:17-cv-2455-CDP
)	
CITY OF ST. LOUIS,)	
)	
Defendant.)	

REPLY TO PLAINTIFFS' OPPOSITION TO MOTION TO STAY

Plaintiffs' opposition to defendant's motion to stay herein is understandable, but they resolutely ignore the central reason that a stay is warranted: a critical issue before the Court of Appeals is plaintiffs' standing. While plaintiffs allude mysteriously to new "compelling" evidence of unconstitutional "customs" of the City, they remain silent about the likelihood that not only will the class be decertified, but that the plaintiffs will be found to lack standing.

Plaintiffs presented a similar argument in their motion to dismiss the defendant's appeal from the Court's summary denial of the motion to dissolve and dismiss, i.e., that there was no reason for the Court of Appeals

to even consider the City's arguments. That motion was denied. See Order of Court of Appeals, Exhibit 1 hereto.

Plaintiffs' trial evidence may not be affected by a reversal of this Court's orders, but defendant's trial evidence certainly will be. Both defendant and the scarce resources of the federal judiciary will be wasted if this Court tries a case when it lacks jurisdiction to do so.

Conclusion

The City respectfully requests that the Court act promptly and stay further proceedings herein pending disposition of the pending appeals.

Respectfully submitted,
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